

1 WENDY MEDURA KRINCEK, ESQ., Bar No. 06417
2 KELSEY E. STEGALL, ESQ., Bar No. 14279
3 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 Email: wkrincek@littler.com
Email: kstegall@littler.com

6 Attorneys for Defendants
7 HOMETOOLS, INC. and THE TJX COMPANIES, INC.

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 PATRICIA McMANUS,
12 Plaintiff,

13 vs.

14 HOMETOOLS, INC., a foreign
15 corporation; THE TJX COMPANIES,
INC., a foreign corporation; DOES 1
16 through 100; and ROE ENTITIES A
through Z, inclusive,

17 Defendants.
18

Case No. 2:19-cv-02240-RFB-BNW

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO FILE A RESPONSIVE
PLEADING TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

19 Plaintiff PATRICIA McMANUS ("Plaintiff"), by and through her attorney of record, Paul S.
20 Padda, Esq., and Defendants HOMETOOLS, INC. and THE TJX COMPANIES, INC. (collectively
21 "Defendants"), by and through their attorneys of record, Littler Mendelson, hereby stipulate to extend
22 the time for Defendants to file a responsive pleading to Plaintiff's Complaint from the current deadline
23 of March 16, 2020, up to and including **March 30, 2020**.

24 As Defense counsel was unaware of service of the Complaint, this extension is necessary to
25 provide adequate time for Defense counsel to become familiar with the allegations in the Complaint
26 and to prepare a responsive pleading.

27 ///

28 ///

1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3
4 Dated: March 16, 2020

Dated: March 16, 2020

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Paul S. Padda, Esq.

8 PAUL S. PADDA, ESQ.
PAUL PADDA LAW, PLLC

9 Attorney for Plaintiff

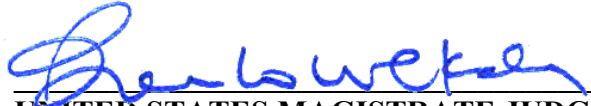


WENDY M. KRINCEK, ESQ.
KELSEY E. STEGALL, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendants
HOMEGOODS, INC. and THE TJX
COMPANIES, INC.

11
12
13
14
15 IT IS SO ORDERED.

16 Dated this 17th day of March, 2020.

17
18 

UNITED STATES MAGISTRATE JUDGE

19 4847-8180-6263.1 053070.1286
20
21
22
23
24
25
26
27
28